

2  
1 Susan M Didriksen, Chapter 7 Trustee  
PO Box 1460  
2 Shingle Springs, CA 95682  
Tel: (530)232-6119  
3 E-mail: [didriksen1@gmail.com](mailto:didriksen1@gmail.com)

4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

In re:

**BONNIE MAE LAWSON**

Debtor.

Case No. 11-46322-A-7

DCN: SMD -1

DATE: January 17, 2012

TIME: 10:00 a.m.

LOCATION: 501 I Street, 7<sup>th</sup> Floor  
Department C  
Courtroom 28 (7<sup>th</sup> Floor)  
Sacramento, CA 95814

TRUSTEE'S MOTION TO SELL PERSONAL PROPERTY OF THE ESTATE  
(11 U.S.C. §363)

The undersigned, Susan M. Didriksen, the court appointed Chapter 7 Trustee (the "Trustee") in the above-captioned Bankruptcy estate of BONNIE MAE LAWSON, (the "Debtor"), hereby requests that this Court approve the sale of the Bankruptcy's Estate's interest in the following personal property:

- 2004 Toyota Camry;

in an "as is" condition, net of any exemptions, to the Debtor for \$4,000 payable in 10 monthly installments of \$400 per month.

In support of this motion, the undersigned Trustee respectfully represents the following:

1. The Debtor filed a voluntary Chapter 7 Bankruptcy Petition on or about November 4, 2011, and an Order for Relief was entered thereon.

2. Susan M. Didriksen was appointed as the Interim Chapter 7 Trustee on or about November 4, 2011, and continues to serve in that capacity.

3. The Court has jurisdiction over the current motion under 28 U.S.C. §§ 157(a) and 1334. This is a core proceeding under 28 U.S.C. section 157(b)(2)(A), (N) and (O).

1           4. The Debtor filed Schedule B on or about November 4, 2011, and disclosed personal  
2 property described as follows:

- 3           • 2004 Toyota Camry with a market value of \$6,775, (hereinafter referred to “motor  
4 vehicle”)

5           5. The Debtor’s Schedule “C” filed on or about November 4, 2011, claimed C.C.P.  
6 §704.010 monetary exemption of \$2,725 on the motor vehicle.

7           6. The Debtor’s Schedule D filed on or about November 4, 2011, disclosed no indebtedness  
8 nor obligations secured by the motor vehicle.

9           7. The Debtor has presented an offer, through her attorney Melissa Clark, in the amount of  
10 \$4,000 to purchase the motor vehicle in an “as-is” condition from the Bankruptcy Estate.

11           8. The payment will be made in the form of monthly Cashier’s Checks in the amount of  
12 \$400 for 10 months to the undersigned Trustee for the purchase of the motor vehicle.

13           9. The undersigned Trustee believes that the immediate liquidation of the Subject Personal  
14 Property is in the best interest of the Bankruptcy Estate. This proposed sale would also alleviate the  
15 typical costs incurred with the sale such as smog test and sales commission attendant to a sale.  
16 Therefore, the Trustee requests the approval from this Court to sell the motor vehicle to the Debtor  
17 for the amount of \$4,000, subject to any overbids tendered at the Court hearing.

18           10. At the Court hearing, the Trustee will request that the Court solicits overbids. The  
19 Trustee further requests that overbids, if any, be submitted in minimum increments of \$200.00 from  
20 qualified bidders who much contact the Trustee at least twenty-four hours prior to this hearing. Any  
21 successful over bidder must remit the full amount of the cash selling price to the Trustee within  
22 twenty-four hours after the Court hearing is concluded.

23           WHEREFORE, the undersigned Trustee respectfully requests that this Court: A.) Approve the  
24 sale of the aforementioned travel trailer to the Debtors in the manner stated herein, B.) Provide  
25 authority for the Trustee to execute all documents necessary to complete the contemplated sale; and,  
26 C.) Provide for such other relief as the Court deems appropriate.

Respectfully submitted,

Dated: December 27, 2011

/s/ Susan M. Didriksen  
Susan M. Didriksen, Chapter 7 Trustee